

09/607,560MS147163.1**REMARKS**

Claims 1-24 and 26-30 are currently pending in the subject application and are presently under consideration. Claims 1, 20, 29 and 30 have been amended herein for clarification purposes only, and such amendments do not narrow the scope of these claims as originally submitted. Claim 25 has been cancelled herein. A listing of all claims is found at pages 2-12 of this Reply.

Applicants' representative notes with appreciation the indication that claims 3-15, 17, 19, 22, and 24 contain allowable subject matter and would be allowable if rewritten in independent form including all limitations of the base claim and any intervening claims. Nevertheless, it is believed such amendments are not necessary in view of the below-noted novel aspects of the invention as recited in the independent claims *vis-à-vis* the cited art. However, applicants' representative reserves the option to these objected to claims in independent form at a later date if necessary.

Favorable reconsideration of the subject application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claims 1-24 and 26-30 Under 35 U.S.C. §112, First Paragraph

Claims 1-24 and 26-30 stand rejected under 35 U.S.C §112, first paragraph. The amendments to claims 1, 20, 29, and 30 are believed to cure any perceived deficiencies of the subject claims. Withdrawal of this rejection is requested.

II. Rejection of Claims 1, 20, 21, 23, 25, 26, 29 and 30 Under 35 U.S.C §102(b)

Claims 1, 20, 21, 23, 25, 26, 29 and 30 stand rejected under 35 U.S.C. §102(b) as being anticipated by Greger Linden, "Structured Document Transformations," 1997, University of Helsinki, Finland, Series of Publications A, Report A-1997-2 (hereinafter Linden). Withdrawal of this rejection is respectfully requested for at least the following reasons. Linden, fails to teach, or suggest all limitations of applicants' invention as recited in the subject claims.

For a prior art reference to anticipate, 35 U.S.C. §102 requires that "*each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art*

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reference.” In re Robertson, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (quoting *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)) (emphasis added). “*The identical invention must be shown in as complete detail as is contained in the ... claim.*” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989) (emphasis added).

As per independent claims 1, 20, 29, and 30, Lindén fails to teach or suggest: (i) *determining source node dependencies* for a target node by *tracing from the target node through the mapping* to the source schema, (ii) matching hierarchy by *generating a hierarchy match list* for the target node, and (iii) generating code according to the *hierarchy match list* as recited in the subject claims. Rather, Lindén teaches a method of specifying source and target relationship rules *via* production group associations and symbol associations, which form a mapping. Such aspect of Lindén (let alone any other aspect thereof) does not anticipate or suggest the recited claim limitations of *determining source node dependencies* for the target node by *tracing from the target node through the mapping* to the source schema. Lindén describes *determining target node dependencies* for the source node by tracing *from the source node through the mapping* to the target tree. It is not necessary, as pointed out in the Office action dated February 5, 2004, for Lindén's method to trace through the mapping *from target to source*; and Lindén does not teach or suggest such aspect of applicant's claimed invention. Accordingly, it is readily apparent that independent claims 1, 20, 29 and 30 (and claims 21, 23 and 26 which respectively depend there from), should be allowable as Lindén fails to disclose each and every limitation as set forth in these claims, and withdrawal of this rejection is respectfully requested.

The rejection of claim 25 in this Office Action is believed to be the result of a typographical error, as this claim was canceled in applicants' previous Reply. Accordingly, this rejection is moot.

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III. Rejection of Claims 2 and 16 Under 35 U.S.C. § 103(a)

Claims 2 and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Lindén in view of Alfred V. Aho *et al.* "Compilers: Principles, Techniques, and Tools," 1986, Addison-Wesley. It is submitted that this rejection should be withdrawn for at least the following reasons.

Claims 2 and 16 depend from independent claim 1. Aho *et al.* does not make up for the aforementioned deficiencies of Lindén with respect to claim 1. Aho *et al.* merely teaches allocation of run-time memory for a compiled program to execute, and does not teach or suggest initialization of memory for a compiler for compilation of code representing a mapping between a source schema and a target schema. Allocation of run-time memory for execution of a program that has already been compiled is not the same as initialization of memory for code that is going to be compiled. Therefore, the combination of these cited references do not make obvious applicants' invention as recited in the subject claims. Withdrawal of this rejection is requested.

IV. Rejection of Claims 18 and 28 Under 35 U.S.C. § 103(a)

Claims 18 and 28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Lindén in view of Alberto Bellina, "XmlTool documentation," 21 January 2003 (hereinafter Bellina). This rejection should be withdrawn for at least the following reasons.

Claims 18 and 28 respectively depend from independent claims 1 and 20. Bellina describes a tool for editing/viewing XML files, converting other file formats into XML files, and generating other file formats from XML files. Bellina does not make up for the aforementioned deficiencies of Lindén with respect to independent claims 1 and 20. Furthermore, Bellina does not teach or suggest generating an XSL style sheet from an XML file for the purpose of *generating code representing a mapping between a source schema and a target schema*, and as conceded by the Examiner, Lindén fails to disclose creating an XSL style sheet.

In view of the above, it is readily apparent that the combination of Lindén and Bellina do not make obvious applicants' claimed invention. Accordingly, withdrawal of this rejection is respectfully requested.

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V. Rejection of Claims 27 Under 35 U.S.C. § 103(a)

Claim 27 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Linden. Withdrawal of this rejection is respectfully requested for at least the following reasons. Claim 27 depends from independent claim 20, and therefore is allowable over Linden for at least the reasons noted *supra* in connection with claim 20.

VII. Conclusion


The present application is believed to be condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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